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U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAVIVIAN WRIGHT,

Defendant

) INFORMATION

1 : 15 CR 311

) CASE NO.

Title 18, Section 1956(h), United
States Code

JUDGE GAUGHAN

COUNT 1

The United States Attorney charges:

From on or about June 2013 through February 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, the Defendant, LAVIVIAN WRIGHT, and James Sorgi, Fred Bagi, Dino Silvestri, Wendi Vicory (not charged herein), and others did knowingly combine, conspire, and agree with each other and with other persons known and unknown to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, distribution of marijuana, in violation of Title 21, United States Code, Section 841(a)(1), knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified

unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

A. James Sorgi organized, directed, managed, and operated a drug trafficking organization (hereinafter referred to as the SORGI DTO) that imported marijuana from California into the Northern District of Ohio for distribution. Sorgi also organized, managed, and operated a money laundering organization (hereinafter referred to as the SORGI MLO) that laundered the proceeds of the DTO's marijuana sales.

B. James Sorgi, and others known and unknown, grew marijuana in Northern California for his DTO.

C. James Sorgi, through LAVIVIAN WRIGHT and on his own, directed members of his DTO in California to ship multi-pound quantities of marijuana from California to the Northern District of Ohio via the United States Mail for distribution. LAVIVIAN WRIGHT, and others known and unknown, mailed and assisted in mailing packages containing multi-pound quantities of marijuana to the Northern District of Ohio for the SORGI DTO. WRIGHT also recruited others to mail packages containing multi-pound quantities of marijuana to Ohio.

D. Members of the SORGI DTO in the Northern District of Ohio received the packages containing multi-pound quantities of marijuana and distributed the marijuana to the DTO's customers.

E. James Sorgi, Dino Silvestri, Fred Bagi, and others mailed the proceeds from the marijuana sales, in the form of cash proceeds and money orders, to LAVIVIAN WRIGHT and other members of the SORGI MLO in California.

F. LAVIVIAN WRIGHT, at James Sorgi's direction, received marijuana proceeds in the form of U.S. currency at her residence in California. WRIGHT gave the cash proceeds to Sorgi after she received them.

G. James Sorgi directed members of his MLO in Ohio to convert marijuana proceeds into money orders. Sorgi then directed members of his MLO to mail the money orders to LAVIVIAN WRIGHT and other members of his MLO in California.

H. LAVIVIAN WRIGHT received marijuana proceeds from the Northern District of Ohio in the form of money orders at her residence in California. WRIGHT cashed the money orders and endorsed the money orders to others, directing them to cash them on her behalf. LAVIVIAN WRIGHT recruited L.W., T.M., J.M. (not charged herein), and others to receive and cash the money orders in California. At WRIGHT's direction, L.W., T.M., J.M., and others cashed the money orders and gave the cash to WRIGHT. WRIGHT then gave the cash to James Sorgi.

I. James Sorgi, through LAVIVIAN WRIGHT, directed members of his MLO in California and elsewhere to use their bank accounts to funnel marijuana proceeds from Ohio to California. Sorgi directed members of his MLO in Ohio to make cash deposits of marijuana proceeds into these accounts. Sorgi, Wendi Vicory, Dino Silvestri, and others deposited marijuana proceeds into these funnel accounts. Sorgi, through LAVIVIAN WRIGHT and by himself, directed members of his organization in California to withdraw the proceeds from these accounts.

J. LAVIVIAN WRIGHT recruited L.W., M.L., D.L., and A.L. (not charged herein) to use their bank accounts to funnel marijuana proceeds from Ohio to California for the SORGI DTO/MLO. At WRIGHT's direction, these persons withdrew the deposited marijuana proceeds from their bank accounts in California and gave the money to WRIGHT.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance thereof, and to effect the goals and conceal the existence of the conspiracy, the defendants and others performed acts in furtherance of the conspiracy in the Northern District of Ohio and elsewhere, including but not limited to the following:

1. On June 20, 2013, in Cleveland, Ohio, James Sorgi deposited \$8,000 of marijuana proceeds into A.L.'s Chase Bank account.
2. On June 20, 2013, in Arcata, California, at the direction of LAVIVIAN WRIGHT, A.L. withdrew \$8,000 of marijuana proceeds from his Chase Bank account. A.L. gave the cash proceeds to WRIGHT.
3. On June 24, 2013, in Cleveland, Ohio, Wendi Vicory deposited \$9,500 of marijuana proceeds into A.L.'s Chase Bank account.
4. On June 24, 2013, in Arcata, California, at the direction of LAVIVIAN WRIGHT, A.L. withdrew \$9,500 of marijuana proceeds from his Chase Bank account. A.L. gave the cash proceeds to WRIGHT.
5. On June 27, 2013, in Cleveland, Ohio, Wendi Vicory deposited \$9,500 of marijuana proceeds into A.L.'s Chase Bank account.
6. On June 27, 2013, in Arcata, California, at the direction of LAVIVIAN WRIGHT, A.L. withdrew \$9,500 of marijuana proceeds from his Chase Bank account. A.L. gave the cash proceeds to WRIGHT.

7. On July 1, 2013, in Cleveland, Ohio, James Sorgi deposited \$9,000 of marijuana proceeds into A.L.'s Chase Bank account.

8. On July 1, 2013, in Arcata, California, at the direction of LAVIVIAN WRIGHT, A.L. withdrew \$9,000 of marijuana proceeds from his Chase Bank account. A.L. gave the cash proceeds to WRIGHT.

9. On July 2, 2013, in Cleveland, Ohio, James Sorgi deposited \$6,000 of marijuana proceeds into A.L.'s Chase Bank account.

10. On July 3, 2013, in Arcata, California, at the direction of LAVIVIAN WRIGHT, A.L. withdrew \$6,000 of marijuana proceeds from his Chase Bank account. A.L. gave the cash proceeds to WRIGHT.

11. On July 5, 2013, in Cleveland, Ohio, James Sorgi and Dino Silvestri deposited \$9,200 of marijuana proceeds into A.L.'s Chase Bank account.

12. On July 5, 2013, in Arcata, California, at the direction of LAVIVIAN WRIGHT, A.L. withdrew \$9,200 of marijuana proceeds from this Chase Bank account. A.L. gave the cash proceeds to WRIGHT.

13. On July 6, 2013, in Rocky River, Ohio, a member of the SORGI MLO deposited \$6,000 of marijuana proceeds into D.L.'s Chase Bank account.

14. On July 8, 2013, in Cleveland, Ohio, James Sorgi deposited \$8,000 of marijuana proceeds into A.L.'s Chase Bank account.

15. On July 8, 2013, in Arcata, California, at the direction of LAVIVIAN WRIGHT, A.L. withdrew \$8,000 of marijuana proceeds from his Chase Bank account. A.L. gave the cash proceeds to WRIGHT.

16. On July 8, 2013, in Eureka, California, at the direction of LAVIVIAN WRIGHT, D.L. withdrew \$6,000 of marijuana proceeds from his Chase Bank account. D.L. gave the cash proceeds to WRIGHT.

17. On July 9, 2013, in Cleveland, Ohio, James Sorgi deposited \$8,000 of marijuana proceeds into D.L.'s Chase Bank account.

18. On July 9, 2013, in Eureka, California, at the direction of LAVIVIAN WRIGHT, D.L. withdrew \$7,900 of marijuana proceeds from his Chase Bank account. D.L. gave the cash proceeds to WRIGHT.

19. On July 10, 2013, in Cleveland, Ohio, Dino Silvestri deposited \$8,000 of marijuana proceeds into A.L.'s Chase Bank account.

20. On July 10, 2013, in Arcata, California, at the direction of LAVIVIAN WRIGHT, A.L. withdrew \$8,000 of marijuana proceeds from his Chase Bank account. A.L. gave the cash proceeds to WRIGHT.

21. On July 10, 2013, in Rocky River, Ohio, Dino Silvestri deposited \$8,000 of marijuana proceeds into D.L.'s Chase Bank account.

22. On July 10, 2013, in Eureka, California, at the direction of LAVIVIAN WRIGHT, D.L. withdrew \$7,900 of marijuana proceeds from his Chase Bank account. D.L. gave the cash proceeds to WRIGHT.

23. On July 11, 2013, in Brunswick, Ohio, Wendi Vicory deposited \$8,000 of marijuana proceeds into D.L.'s Chase Bank account.

24. On July 12, 2013, in Eureka, California, at the direction of LAVIVIAN WRIGHT, D.L. withdrew \$7,990 of marijuana proceeds from his Chase Bank account. D.L. gave the cash proceeds to WRIGHT.

25. On July 16, 2013, in Brunswick, Ohio, Wendi Vicory deposited \$8,500 of marijuana proceeds into D.L.'s Chase Bank account.

26. On July 16, 2013, in Eureka, California, at the direction of LAVIVIAN WRIGHT, D.L. withdrew \$8,400 of marijuana proceeds from his Chase Bank account. D.L. gave the cash proceeds to WRIGHT.

27. On July 17, 2013, in Strongsville, Ohio, Wendi Vicory deposited \$9,500 of marijuana proceeds into D.L.'s Chase Bank account.

28. On July 17, 2013, in Eureka, California, at the direction of LAVIVIAN WRIGHT, D.L. withdrew \$9,400 of marijuana proceeds from his Chase Bank account. D.L. gave the cash proceeds to WRIGHT.

29. On July 18, 2013, in Brunswick, Ohio, Wendi Vicory deposited \$9,500 of marijuana proceeds into D.L.'s Chase Bank account.

30. On July 18, 2013, in Eureka, California, at the direction of LAVIVIAN WRIGHT, D.L. withdrew \$9,400 of marijuana proceeds from his Chase Bank account. D.L. gave the cash proceeds to WRIGHT.

31. On July 19, 2013, in Cleveland, Ohio, Wendi Vicory deposited \$6,800 of marijuana proceeds into D.L.'s Chase Bank account.

32. On July 20, 2013, in Brunswick, Ohio, a member of the SORGI MLO deposited \$9,500 of marijuana proceeds into D.L.'s Chase Bank account.

33. On July 22, 2013, in Eureka, California, at the direction of LAVIVIAN WRIGHT, D.L. withdrew \$8,000 of marijuana proceeds from his Chase Bank account. D.L. gave the cash proceeds to WRIGHT.

34. On July 23, 2013, in Eureka, California, at the direction of LAVIVIAN WRIGHT, D.L. withdrew \$4,000 of marijuana proceeds from his Chase Bank account. D.L. gave the cash proceeds to WRIGHT.

35. On July 24, 2013, Dino Silvestri sent marijuana proceeds in the United States Mail from the Northern District of Ohio to LAVIVIAN WRIGHT in McKinleyville, California.

36. On July 24, 2013, in Eureka, California, at the direction of LAVIVIAN WRIGHT, D.L. withdrew \$4,000 of marijuana proceeds from his Chase Bank account. D.L. gave the cash proceeds to WRIGHT.

37. On July 27, 2013, LAVIVIAN WRIGHT received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from Dino Silvestri.

38. On July 30, 2013, Wendi Vicory sent marijuana proceeds in the United States Mail from the Northern District of Ohio to LAVIVIAN WRIGHT in McKinleyville, California.

39. On August 2, 2013, LAVIVIAN WRIGHT received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from Wendi Vicory.

40. On August 26, 2013, LAVIVIAN WRIGHT received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from a member of the SORGI MLO.

41. On August 27, 2013, Dino Silvestri sent marijuana proceeds in the United States Mail from the Northern District of Ohio to LAVIVIAN WRIGHT in McKinleyville, California.

42. On August 30, 2013, LAVIVIAN WRIGHT received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from Dino Silvestri.

43. On September 3, 2013, LAVIVIAN WRIGHT received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from Dino Silvestri.

44. On September 9, 2013, LAVIVIAN WRIGHT received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from a member of the SORGI MLO.

45. On September 10, 2013, LAVIVIAN WRIGHT received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from a member of the SORGI MLO.

46. On September 17, 2013, Fred Bagi sent marijuana proceeds in the United States Mail from the Northern District of Ohio to LAVIVIAN WRIGHT in McKinleyville, California.

47. On September 20, 2013, LAVIVIAN WRIGHT received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from Fred Bagi.

48. On October 2, 2013, Fred Bagi sent marijuana proceeds in the United States Mail from the Northern District of Ohio to LAVIVIAN WRIGHT in McKinleyville, California.

49. On October 5, 2013, LAVIVIAN WRIGHT received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from Fred Bagi.

50. On October 5, 2013, Fred Bagi attempted to send \$5,400 of marijuana proceeds in the United States Mail to LAVIVIAN WRIGHT in McKinleyville, California.

51. On October 5, 2013, a member of the SORGI MLO attempted to send \$5,500 of marijuana proceeds in the United States Mail to LAVIVIAN WRIGHT in McKinleyville, California.

52. On October 7, 2013, a member of the SORGI MLO attempted to send \$5,500 of marijuana proceeds in the United States Mail to LAVIVIAN WRIGHT in McKinleyville, California.

53. On October 7, 2013, a member of the SORGI MLO attempted to send \$5,500 of marijuana proceeds in the United States Mail to LAVIVIAN WRIGHT in McKinleyville, California.

54. On October 9, 2013, Fred Bagi attempted to send \$7,000 of marijuana proceeds in the United States Mail to LAVIVIAN WRIGHT in McKinleyville, California.

55. On October 9, 2013, Fred Bagi attempted to send \$8,500 of marijuana proceeds in the United States Mail to LAVIVIAN WRIGHT in McKinleyville, California.

56. On October 10, 2013, Fred Bagi attempted to send \$8,700 of marijuana proceeds in the United States Mail to LAVIVIAN WRIGHT in McKinleyville, California.

57. On October 11, 2013, a member of the SORGI MLO attempted to send \$5,000 of marijuana proceeds in the United States Mail to LAVIVIAN WRIGHT in McKinleyville, California.

58. On October 11, 2013, a member of the SORGI MLO attempted to send \$5,000 of marijuana proceeds in the United States Mail to LAVIVIAN WRIGHT in McKinleyville, California.

59. On December 24, 2013, in Van Wert, Ohio, a member of the SORGI MLO made two \$9,000 deposits of marijuana proceeds into M.L.'s Wells Fargo accounts.

60. On December 26, 2013, in Arcata, California, at the direction of LAVIVIAN WRIGHT, M.L. withdrew \$18,000 of marijuana proceeds from her Wells Fargo accounts. M.L. gave the cash proceeds to WRIGHT.

61. On January 3, 2014, in Van Wert, Ohio, a member of the SORGI MLO made two \$7,500 deposits of marijuana proceeds into M.L.'s Wells Fargo account.

62. On January 7, 2014, in Arcata, California, at the direction of LAVIVIAN WRIGHT, M.L. withdrew \$15,000 from her Wells Fargo accounts. M.L. gave the cash proceeds to WRIGHT.

63. On May 6, 2014, LAVIVIAN WRIGHT cashed four \$1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

64. On May 13, 2014, LAVIVIAN WRIGHT cashed five \$1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

65. On May 14, 2014, LAVIVIAN WRIGHT cashed a \$1,000 U.S. Postal Service money order that constituted marijuana proceeds from Ohio.

66. On May 14, 2014, at the direction of LAVIVIAN WRIGHT, J.M. cashed a \$1,000 U.S. Postal Service money order that constituted marijuana proceeds from Ohio. J.M. gave the cash proceeds to WRIGHT.

67. On May 15, 2014, at the direction of LAVIVIAN WRIGHT, T.M. cashed four \$1,000 U.S. Postal Service money orders made payable to J.M. that constituted marijuana proceeds from Ohio. T.M. gave the cash proceeds to WRIGHT.

68. On May 19, 2014, LAVIVIAN WRIGHT cashed three \$1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

69. On May 21, 2014, LAVIVIAN WRIGHT cashed two \$1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

70. On May 28, 2014, at the direction of LAVIVIAN WRIGHT, J.M. cashed five \$1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio. J.M. gave the cash proceeds to WRIGHT.

71. On June 3, 2014, at the direction of LAVIVIAN WRIGHT, J.M. cashed four \$1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio. J.M. gave the cash proceeds to WRIGHT.

72. On June 4, 2014, LAVIVIAN WRIGHT cashed three \$1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

73. On June 9, 2014, at the direction of LAVIVIAN WRIGHT, J.M. cashed \$6,000 of U.S. Postal Service money orders that constitute marijuana proceeds from Ohio. J.M. gave the cash proceeds to WRIGHT.

74. On June 16, 2014, at the direction of LAVIVIAN WRIGHT, J.M. cashed \$2,000 of U.S. Postal Service money orders that constituted marijuana proceeds from Ohio. J.M. gave the cash proceeds to LAVIVIAN WRIGHT.

75. On June 17, 2014, at the direction of LAVIVIAN WRIGHT, T.M. cashed four \$1,000 U.S. Postal Service money orders that were made payable to LAVIVIAN WRIGHT, which constituted marijuana proceeds from Ohio.

76. On June 19, 2014, LAVIVIAN WRIGHT cashed three \$1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

77. On June 20, 2014, LAVIVIAN WRIGHT cashed three \$1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

78. On June 20, 2014, at the direction of LAVIVIAN WRIGHT, J.M. cashed two \$1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio. J.M. gave the cash proceeds to LAVIVIAN WRIGHT.

All in violation of Title 18, Section 1956(h), United States Code.

STEVEN M. DETTELBACH
United States Attorney

By:


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